RCRA Subtitle I Inspection Report

UST Compliance Inspection

Ashland, Inc.
329 West Main Street
Elkton, MD 21921

Date of Inspection:
March 23, 2010

Facility Identification Number: 0002738

EPA Representatives:

Jan Szaro, Environmental Engineer
U.S. Environmental Protection Agency
(215) 814-3421

Jeanna Henry, Environmental Scientist
U.S. Environmental Protection Agency
(215) 814-2820

Gary Morton, Environmental Protection Specialist
U.S. Environmental Protection Agency
(215) 814-3159

State Representative:

Baruch Onyekwelu
Maryland Department of the Environment
(410) 537-3400

Tank Owner:

Ashland, Inc.
329 West Main Street
Elkton, MD 21921

Facility Representatives:

Bill Hill, Site Supervisor
Gordon Mueller, Quality Manager
Andre Simmons, Process Engineer
Sam Park, Production Supervisor
(410) 392-8811

Inspector Signature: _____ Date: 3/23/10

Background

On March 23, 2010 the United States Environmental Protection Agency, Region III (EPA) conducted a Compliance Evaluation Inspection (CEI) of the Ashland facility at 329 West Main St. in Elkton, MD to determine the extent of compliance with Subtitle I of the Resource Conservation and Recovery Act (RCRA). USEPA Inspector Jan Szaro was assigned to conduct this inspection in conjunction with a CEI to also determine compliance with Subtitle C (Hazardous Waste) of RCRA. Mr. Szaro was accompanied by USEPA Inspectors Jeanna Henry and Gary Morton. Maryland Department of the Environment (MDE) was represented by Inspector Baruch Onyekwelu of the MDE Hazardous Waste Program on the day of the inspection.

Inspection Observations

Ashland, Inc. is listed as the owner of the USTs on the facility summary form provided by MDE. This inspector contacted Herb Meade of MDE on March 9, 2010 to coordinate inspection of the USTs at the facility. Mr. Meade informed Inspector Szaro on March 10th that MDE would be unable to send a UST program representative along on the inspection. The tank owner was not contacted prior to the inspection. The inspection was conducted on March 23, 2010. The facility was open and operating during the time of inspection.

This facility is operated as a chemical manufacturing facility for the production of water based polymers primarily for the wood glue industry. Five (5) underground storage tanks (UST) are present at the facility. Four (4) of the USTs are used for chemical raw material storage and one (1) UST is used to store heating oil that is used as a backup fuel source for the onsite boiler that supplies process steam. Two (2) of the chemical USTs store butyl acrylate monomer while the other two (2) chemical USTs store vinyl acetate monomer. The vinyl acetate monomer is listed as a hazardous substance for RCRA Subtitle I purposes. There are no dispensers associated with any of the USTs present at the facility. See Table 1 for basic information of the five (5) USTs.

Table 1
USTs located at Ashland, Inc. # 0002738
Elkton, MD 21921

Tank No.	Material	Capacity (Gal)
VAM USTs located by East Storage Area		
1	Vinyl Acetate Monomer **(VAM)**	25,000
2	Vinyl Acetate Monomer **(VAM)**	25,000
Heating Oil UST located by Boiler Room & Maintenance Shop		
3	Heating Oil	10,000
BA USTs located by North Storage Area		
4	Butyl Acrylate Monomer **(BA)**	12,000
5	Butyl Acrylate Monomer **(BA)**	6,000

This inspector presented credentials on arrival at the facility and explained the purpose of the inspection to the four (4) facility representatives listed on the cover sheet of this report. The facility representatives verified that the facility and the UST systems are owned and operated by Ashland, Inc. It was further stated that the Elkton facility was one of two similar facilities that Ashland acquired from Air Products & Polymers on July 1, 2008. The other facility is located in Piedmont, SC. Facility personnel added that the main person with environmental reporting responsibilities for the two facilities is Marie Stack, who operates out of the Piedmont facility.

The two (2) VAM UST systems are further discussed in detail as they are EPA regulated USTs. A leak detection inspection checklist is included as Attachment 1 for the VAM UST systems. Photographic documentation of selected observations for the UST systems is included as Attachment 2. A site plan of the facility is included as Attachment 3. The UST locations have been highlighted.

General Discussion of VAM UST systems

The VAM USTs were installed in June 1954 while the facility was known as Colton Chemical Company. The USTs are of single wall steel construction. The piping associated with these USTs was observed to be of metal construction and almost exclusively aboveground. Pumps to supply VAM to process tanks from the USTs were observed to be aboveground with supply piping emerging through a bolted manhole on top of each UST. See PHOTOS I-16 through I-20. Portions of the original design and layout drawings of these USTs are included as Attachment 4.

VAM is unloaded mostly by top unloading from railcars where the bottom valve of the railcar is not opened while the railcar is onsite. PHOTO I-7 shows the top unloading line and the vent line at the VAM railcar unloading area. The railcar unloading area is across the facility from the VAM UST area. A separate unloading line exists for tank trucks to gravity unload. This tank truck unloading area is immediately east of the VAM UST area and is shown in PHOTO I-21. This truck unloading area is equipped with secondary containment.

Release Detection

Electronic tank level readouts for the VAM USTs were observed in the scale house by the VAM storage area (PHOTO I-3) and in the shed by the VAM railcar unloading area. (PHOTO I-8) No historical documentation of tank volume was available at the facility.

Monitor ports for vapor monitor sampling were observed at four points in the VAM UST area and are shown in PHOTOS I-2, I-21 and I-22. Facility personnel stated that the analysis of the vapor sampling is conducted by gas chromatography performed onsite. Monthly sampling results from January 2007 through the present were provided with all results listed as 0.

The facility personnel could not provide the site assessment for the design and operation of the vapor monitoring system at the time of the inspection. It has since been provided and is included as Attachment 5. Standard operating procedures (SOP) were provided for vinyl acetate underground leak monitoring, GC headspace calibration and headspace gas chromatograph analysis. These procedures are included as Attachment 6.

Spill & Overfill

Spill buckets were not observed for the VAM USTs. The unloading lines are hard-piped to the top of the VAM USTs. See PHOTO I-17 which depicts the fill connection at the center of the photo. The small stainless steel line is a recirculation line from the process supply pump which is used if the pump needs to regain suction. Usually occurs after a railcar delivery when nitrogen is used to purge the unloading line. At the railcar unloading area flex lines are broken directly above the manhole of the railcar so that any spillage will drop into the railcar. At the tank truck unloading area unloading takes place over a secondary containment area which will catch any spills.

Overfill protection is provided by an audible alarm that can be heard throughout the entire facility. Facility personnel ran a satisfactory test of the audible alarm while the inspectors were present. The alarm test and silence buttons are shown in PHOTO I-8 on the control panel at the VAM railcar unloading shed.

Corrosion Protection

According to the notification form the product lines are of single-walled metal construction. The USTs were installed in 1954 and are of single-walled steel design. An impressed current cathodic protection was observed and noted to be functioning. The rectifier box was observed inside the Scale House and is shown in PHOTOS I-14 and I-15. The readings were 34 volts and 7.2 amps at the time of inspection. A log of impressed current readings from 9/26/08 until the present was obtained and is included as Attachment 7. There were no observable periods when log entries were of greater than 60 day increments. The report from a survey conducted by Corrpro on November 13, 2009 is included as Attachment 8. A report from corrosion testing conducted on November 14, 2008 was also made available by the facility. A separate report from Corrpro documents the installation and post-installation testing of the impressed current system in 1998. The report is included as Attachment 9.

Financial Assurance

Self-insured financial assurance documentation dated December 15, 2008 was made available to the inspectors. The documentation is a yearly requirement which would have been due by December 15, 2009 but EPA does not have a financial assurance requirement for hazardous substance USTs.

Secondary Containment

Hazardous substance USTs were required to have secondary containment by December 22, 1998. The vinyl acetate monomer (VAM) stored in USTs at the Elkton facility is on the hazardous substance list. Discussion with the facility representatives confirmed that the VAM USTs at the facility are single-walled steel tanks with no means of secondary containment. The facility representative further confirmed that these USTs are the original USTs that were installed in the 1950s.

Attachments

1. Leak Detection Inspection Checklist
2. Photographs
3. Facility Site Plan
4. 1950s VAM UST drawings
5. Vapor Monitoring Site Survey
6. Vapor monitoring results & procedures
7. Impressed current inspections for VAM & Heating Oil USTs (9/26/08 – 3/15/10)
8. 2009 Corrpro cathodic protection survey
9. 1998 Corrpro catodic protection installation report

ATTACHMENT 1

ility ID Number 0002738

Leak Detection Inspection Checklist

I. Ownership of Tank(s)	II. Location of Tank(s)
shland, Inc. 29 West Main Street lkton, MD 21921	Same as Owner Number of Tanks at This Location: 2

I. Tank Information

Complete for each tank. If facility has more than 4 tanks, photocopy page and complete information for additional tanks.

Tank presently in use (circle)	Tank 1 (YES)	Tank 2 (YES)	Tank 3	Tank 4
f not, date last used				
f emptied, verify 1" or less of product in tank				
Month and Year Tank Installed	6/1954	6/1954		
Material of Construction tank/pipe	SWS/SWS	SWS/SWS		
Capacity of Tank (in gallons)	25,000	25,000		
Substance Stored	Vinyl Acetate Monomer	Vinyl Acetate Monomer		

A. Release Detection For Tanks

Check the release detection method(s) used for each tank or N/A if none required.

Manual Tank Gauging (tanks under 1,000 gal.)				
Manual Tank Gauging and Tank Tightness Testing tanks under 2,000 gal.)				
Tank Tightness Testing and Inventory Control				
Automatic Tank Gauging				
Vapor, Groundwater or Interstitial Monitoring	V	V		
Other approved method (SIR)				

B. Release Detection For Piping

Check the release detection method(s) used for piping.

heck Pressurized (P) or Suction (S) Piping for ach tank	S	S		
utomatic Line Leak Detectors, **and** check one				
apor or Groundwater Monitoring	V	V		
econdary Containment with Monitoring				
ne Tightness Testing				

Jan Szaro (print name) certify that I have inspected the above named facility on 3/23/10 month/day/year

ector's Signature: Jan Szaro Date May 3, 2010

Facility ID Number 0002738

Leak Detection for Piping

Pressurized Piping **A method must be selected from each set. Where applicable indicate date of last test. If this facility has more than 4 tanks, please photocopy this page and complete information for all additional piping.**

Set 1	Tank 1	Tank 2	Tank 3	Tank 4
Automatic Flow Restrictor				
Automatic Shut-off Device				
Continuous Alarm System				
and				
Set 2				
Annual Line Tightness Testing				
Interstitial Monitoring				
Interstitial Monitoring, documentation of monthly monitoring is available				
Ground-Water or Vapor Monitoring				
Ground-Water or Vapor Monitoring, documentation of monthly monitoring is available				
Other Approved Method (specify in comments section)				
Suction Piping. **Indicate date of most recent test.**				
Line Tightness Testing (required every 3 years)				
Secondary Containment with Interstitial Monitoring				
Ground-Water or Vapor Monitoring	V	V		
Other Approved Method (specify in comments section)				
No Leak Detection Required (must answer yes to all of the following questions)	X	X		
Operates at less than atmospheric pressure	X	X		
Has only one check valve, which is located directly under pump	X	X		
Type of piping allows product to drain back into tank when suction released	X	X		
The above information on suction piping is verifiable	X	X		

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: See cutaway sketch in Attchment 4 for piping from USTs

Inspector's Signature: [signature] Date: 5/3/10

acility ID Number 0002738

Inventory Control and Tank Tightness Testing N/A

Method of tank tightness testing: N/A

Address of tank tightness tester: _____

Please complete all information for each tank — **If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.**

	Tank 1	Tank 2	Tank 3	Tank 4
Date of last tank tightness test.				
Did tank pass test? Indicate yes or no. If no, specify in comments section below the status of the tank or what ctions have been taken (e.g., has state been notified?)				
Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and vailable.				
Overages or shortages are less than 1% + 130 gals of tank's low-through volume.				
no, which months were not?				

Please answer yes or no for each question

Owner/operator can explain inventory control methods and figures used and recorded.	Yes ☐	No ☐
ecords include monthly water monitoring.	Yes ☐	No ☐
ank inventory reconciled before and after fuel delivery.	Yes ☐	No ☐
ooks are reconciled monthly.	Yes ☐	No ☐
ppropriate calibration chart is used for calculating volume.	Yes ☐	No ☐
ispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes ☐	No ☐
he drop tube in the fill pipe extends to within one foot of tank bottom.	Yes ☐	No ☐
wner can demonstrate consistency in dipsticking techniques.	Yes ☐	No ☐
ie dipstick is long enough to reach the bottom of the tank.	Yes ☐	No ☐
ie ends of the gauge stick are flat and not worn down.	Yes ☐	No ☐
ie dipstick is marked legibly & the product level can be determined to the nearest 1/8th inch.	Yes ☐	No ☐
ie tank has been tested within the year & has passed the tightness test (if necessary).	Yes ☐	No ☐
third-party certification of the tank tightness test method is available.	Yes ☐	No ☐
nk tester complied with all certification requirements.	Yes ☐	No ☐
onitoring and testing are maintained and available for the past 12 months.	Yes ☐	No ☐

mments: _____

pector's Signature: _____ Date: 5/13/10

acility ID Number 0002738

Vapor Monitoring

Name of monitoring device: _____

Date system installed _____ Number of monitoring wells Four (4)

Distance of monitoring well(s) from tank(s) (1) _____ (2) _____ (3) _____ (4) _____

Site assessment was conducted by: R.E. Wright

Location of site assessment documentation: _____

Please indicate yes or no for each tank **Please complete all information for each tank. If facility has more than 4 tanks, please photocopy this page and complete the information for additional tanks.**

	Tank 1	Tank 2	Tank 3	Tank 4
Well is clearly marked and secured.	Y	Y		
Well caps are tight.	Y	Y		
Well is constructed so that monitoring device is not rendered inoperative by moisture or other interferences.	Y	Y		
Well is free of debris or has other indications that it has been recently checked.	No access	No access		
Please answer yes or no for each question				
UST excavation zone was assessed prior to vapor monitoring system installation.	Yes X	No ☐		
One or more USTs is/are included in system.	Yes X	No ☐		
If the system is automatic, check the following:				
Power box is accessible and power light is on.	Yes ☐	No ☐		
Documentation of monthly readings is available for last 12 months.	Yes ☐	No ☐		
Equipment used to take readings is accessible and functional.	Yes ☐	No ☐		
Vapor monitoring equipment has been calibrated within the last year.	Yes ☐	No ☐		
If the system is manual, check the following:				
Documentation of monthly readings is available for last 12 months.	Yes X	No ☐		
Equipment used to take readings is accessible and functional.	Yes X	No ☐		
Vapor monitoring equipment has been calibrated within the last year.	Yes X	No ☐		
Hazardous material was used for backfill.	Yes ☐	No ☐		
Wells are placed within the excavation zone.	Yes ☐	No ☐		
Level of background contamination is known. If so -- what is level?	Yes ☐	No ☐		

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: See Attachment 5. Documentation to support the VAM vapor monitoring appears to be incomplete.

Inspector's Signature: _____ Date: 5/13/10

Site Sketch/Photo Log

cility ID Number 0002738

Manual Tank Gauging N/A

Manual tank gauging may be used as the sole method of leak detection only for tanks of 1,000 gal. or fewer or in combination with tank ghtness testing for tanks of up to 2,000 gal.
lease indicate the number of the tank or tanks for which manual tank gauging is used as the main leak detection method (e.g., tanks 1 &
): N/A

lease answer yes or no for each question		
ecords show liquid level measurements are taken at beginning and end of riod of at least ([Circle one] 36, 44, 58) hours during which no liquid is added or removed from the tank.	Yes ☐	No ☐
evel measurements are based on average of two consecutive stick readings at th beginning and end of period.	Yes ☐	No ☐
onthly average of variation between beginning and end measurements is less an standard shown below for corresponding size and dimensions of tank and aiting time.	Yes ☐	No ☐
auge stick is long enough to reach bottom of the tank. Ends of gauge stick are t and not worn down.	Yes ☐	No ☐
auge stick is marked legibly and product level can be determined to the nearest e-eighth of an inch.	Yes ☐	No ☐
TG is used as sole method of leak detection for tank.	Yes ☐	No ☐
TG is used in conjunction with tank tightness testing.	Yes ☐	No ☐
e all tanks for which MTG is used under 2,000 gallons in capacity?	Yes ☐	No ☐
e monitoring records available for the last 12 month period?	Yes ☐	No ☐

Check One:	Nominal Tank Capacity (in gallons)	Tank Dimensions	Monthly Standard (in gallons)	Minimum Test Duration
( )	110-550	N/A	5	36 hours
( )	551 - 1,000*	N/A	7	36 hours
( )	1,000*	64" diameter x 73" length	4	44 hours
( )	1,000*	48" diameter x 128" length	6	58 hours
( )	1,001 - 2,000*	N/A	13	36 hours

anual tank gauging must be used in combination with tank tightness testing for tanks over 550 gal. and up to 2,000 gal.

ments:

ector's Signature: Date: 5/3/12

acility ID Number 0002738

Ground Water Monitoring N/A

Date System Installed: N/A

Distance of well from tank(s) (1)_____ (2)_____ (3)_____ (4)_____

Distance of well from piping (1)_____ (2)_____ (3)_____ (4)_____

Site assessment was conducted by:_____

Location of site assessment documentation:_____

Please answer each question of each well **If there are more than 4 wells, please photocopy this page and complete the information for all additional wells.**

	Well 1	Well 2	Well 3	Well 4
Well is clearly marked and secured to avoid unauthorized access or tampering.				
Well was opened and presence of water was observed in well at depth of _____ ft.				

Please answer yes or no for each question

Wells are used to monitor piping.	Yes ☐	No ☐
Site assessment was performed prior to installation of wells.	Yes ☐	No ☐
Documentation of monthly readings is available.	Yes ☐	No ☐
Specific gravity of product is less than one.	Yes ☐	No ☐
Hydraulic conductivity of soil between UST system and monitoring wells is not less than 0.01 cm/sec. According to:	Yes ☐	No ☐
Groundwater is not more than 20 feet from ground surface.	Yes ☐	No ☐
Wells are sealed from the ground surface to top of filter pack.	Yes ☐	No ☐
Continuous monitoring device or manual bailing methodused can detect the presence of at least one-eighth of an inch of the product on top of groundwater in well.	Yes ☐	No ☐
Groundwater is monitored:( ) Manually on a monthly basis. ( ) Automatically (continuously or monthly basis[Circle one]).		
Check the following if groundwater is monitored<u>manually</u>: Bailer used is accessible and functional.	Yes ☐	No ☐
Check the following if groundwater is monitored<u>automatically</u>: Monitoring box is operational.	Yes ☐	No ☐
Checked for presence of sensor in monitoring well.	Yes ☐	No ☐

the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location wells and their distance from tanks and piping.

Comments: _____

Inspector's Signature: _____ Date: 5/3/10

Facility ID Number 0002738

Interstitial Monitoring N/A

Manufacturer and name of system:

Date system installed:

Materials used for secondary barrier:

Materials used for internal lining:

nterstitial space is monitored (Circle one): automatically, continuously, monthly basis.

Please answer yes or no for each question			
All tanks in system are fitted with secondary containment and interstitial monitoring.	Yes ☐	No ☐	N/A ☐
System is designed to detect release from any portion of UST system that routinely contains product.	Yes ☐	No ☐	N/A ☐
Monitoring method is documented as capable of detecting a leak as small as .1 gal./hr. with at least a 95% probability of detection and a probability of false alarm of no more than 5%.	Yes ☐	No ☐	N/A ☐
Documentation of monthly readings is available for last 12 months.	Yes ☐	No ☐	N/A ☐
Maintenance and calibration documents and records are available and indicate appropriate maintenance procedures for system have been implemented.	Yes ☐	No ☐	N/A ☐
Monitoring box, if present, is operational.	Yes ☐	No ☐	N/A ☐
monitoring wells are part of leak detection system, monitoring wells are clearly marked and secured o avoid unauthorized access and tampering.	Yes ☐	No ☐	N/A ☐
nterstitial space is monitored manually on monthly basis (answer the following question).	Yes ☐	No ☐	N/A ☐
quipment used to take readings is accessible and functional.	Yes ☐	No ☐	N/A ☐
ank is double-walled	Yes ☐	No ☐	N/A ☐
ank is fitted with internal bladder to achieve secondary containment (answer the following uestion).	Yes ☐	No ☐	N/A ☐
ladder is compatible with substance stored and will not deteriorate in the presence of that substance.	Yes ☐	No ☐	N/A ☐
xcavation is lined with impervious artificial material to achieve secondary containment nswer the following questions).	Yes ☐	No ☐	N/A ☐
econdary barrier is always above groundwater.	Yes ☐	No ☐	N/A ☐
secondary barrier is not always above groundwater, secondary barrier and monitoring designs are r use under such conditions.	Yes ☐	No ☐	N/A ☐
condary barrier is constructed from artificially constructed material, with permeability to substance 10^{6} cm/sec.	Yes ☐	No ☐	N/A ☐
condary barrier is compatible with the regulated substances stored and will not deteriorate in esence of that substance.	Yes ☐	No ☐	N/A ☐
condary barrier does not interfere with operation of cathodic protection system.	Yes ☐	No ☐	N/A ☐

mments:

pector's Signature: Date: 5/13/15

Facility ID Number 0002738

Automatic Tank Gauging N/A

Manufacturer, name and model number of system: _____

Please answer yes or no for each question

Device documentation is available at site (e.g., manufacturer's brochures, owner's manual).	Yes ☐	No ☐
Device can measure height of product to nearest one-eighth of an inch.	Yes ☐	No ☐
Documentation shows that water in bottom of tank is checked monthly to nearest one-eighth of an inch.	Yes ☐	No ☐
Documentation is available that the ATG was in test mode a minimum of once a month.	Yes ☐	No ☐
Checked for presence of gauge in tanks.	Yes ☐	No ☐
Checked for presence of monitoring box and evidence that device is working (i.e., device is equipped with roll of paper for results documentation).	Yes ☐	No ☐
Owner/operator has documentation on file verifying method meets minimum performance standards of .20 gph with probability of detection of 95% and probability of false alarm of 5% for automatic tank gauging (e.g., results sheets under EPA's "Standard Test Procedures for Evaluating Leak Detection Methods").	Yes ☐	No ☐
Checked documentation that system was installed, calibrated, and maintained according to manufacturer's instructions.	Yes ☐	No ☐
Maintenance records are available upon request.	Yes ☐	No ☐
Monthly testing records are available for the past 12 months.	Yes ☐	No ☐
Daily monitoring records are available for the past 12 months (if applicable).	Yes ☐	No ☐

Comments: Facility has electronic level gauges, but not ATGs.

Inspector's Signature: _____ Date: 5/3/10

acility ID Number 0002738

Statistical Inventory Reconciliation N/A

lease complete all information for each tank	If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.			
ocumentation of deliveries and sales balances with daily easurements of liquid volume in tank are maintained and vailable.				

lease answer yes or no for each question		
ecords include monthly water monitoring.	Yes ☐	No ☐
ank inventory reconciled before and after fuel delivery.	Yes ☐	No ☐
ppropriate calibration chart is used for calculating volume.	Yes ☐	No ☐
ispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes ☐	No ☐
he drop tube in the fill pipe extends to within one foot of tank bottom.	Yes ☐	No ☐
nswer one of the following three:		
) Owner can demonstrate consistency in dipsticking techniques.	Yes ☐	No ☐
) The dipstick is long enough to reach the bottom of the tank.	Yes ☐	No ☐
) The end of the gauge stick is flat and not worn down.	Yes ☐	No ☐
) The dipstick is legible & the product level can be determined to the nearest 1/8th inch.	Yes ☐	No ☐
OR		
Automatic tank gauge is used for readings.	Yes ☐	No ☐
OR		
Other method is used for readings (explain in comment section below).	Yes ☐	No ☐
third-party certification of the SIR method is available.	Yes ☐	No ☐
onitoring and testing records are maintained and available for the past 12 months.	Yes ☐	No ☐

mments: _____

pector's Signature: _____ Date: 5/13/10

Facility ID Number 0002738

Spill/Overfill Prevention

	Tank 1	Tank 2	Tank 3	Tank 4
Are all tank transfers less than 25 gallons?	Yes ☐ No **X**	Yes ☐ No **X**	Yes ☐ No ☐	Yes ☐ No ☐
Spill Prevention				
s there a spill bucket (at least 5 gallons) or another device hat will prevent release of product to the environment (such ıs a dry disconnect coupling)?	Yes **X** No ☐	Yes **X** No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Overfill Prevention				
What device is used to prevent tank from being overfilled?				
Ball float valve	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Butterfly valve (in fill pipe)	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Automatic alarm monitoring is used	Yes **X** No ☐	Yes **X** No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Other alarm system	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐

DOES THE FACILITY HAVE A FINANCIAL ASSURANCE MECHANISM? YES X NO __ (PROVIDE COMMENTS AS TO COMPLIANCE STATUS FOR 40 C.F.R. PART 280 SUBPART H.)

Cathodic Protection

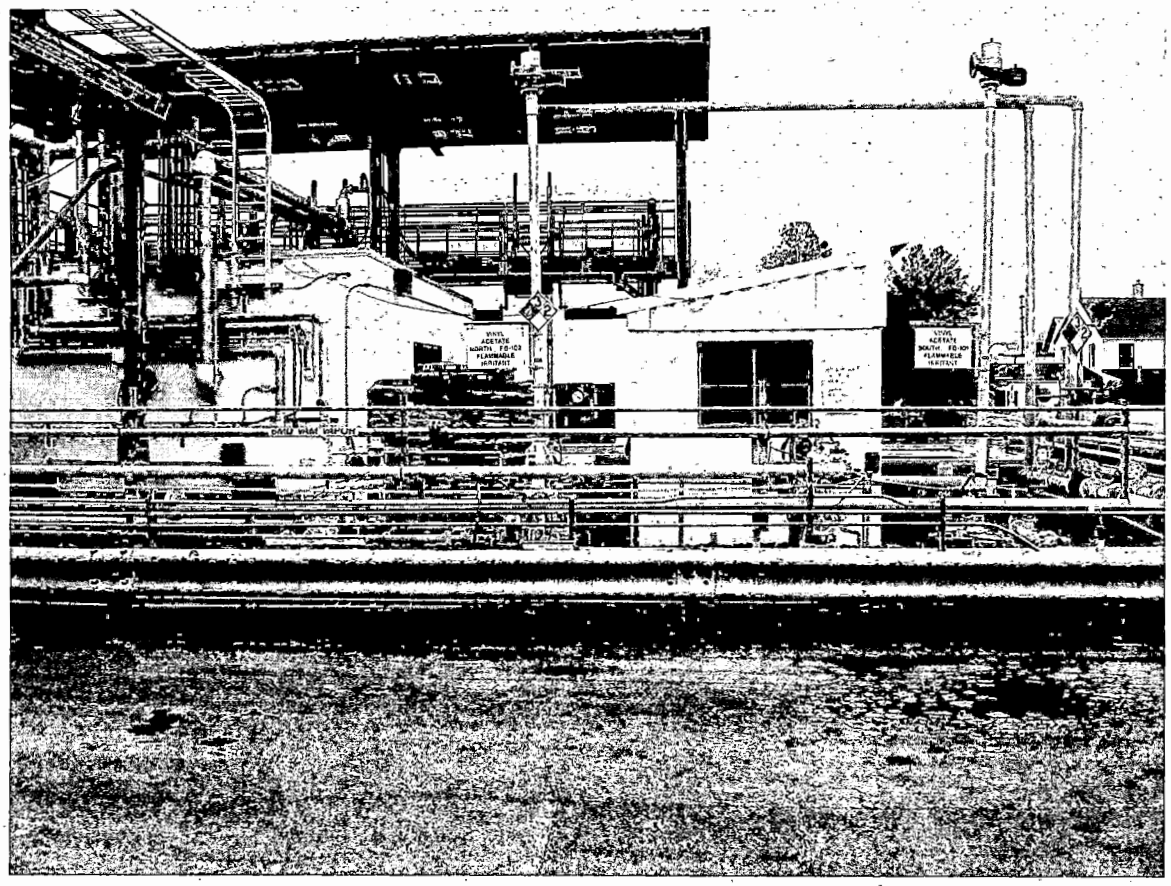
	Tank 1	Tank 2	Tank 3	Tank 4
acrificial Anode System				
est results show a negative voltage of at least 0.85 Volts ısing the tank and a copper/copper sulfate cell)?	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
he last two test results are available. (Tests are required ery three years.)	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
npressed Current				
ctifier is on 24 hours a day?	Yes **X** No ☐	Yes **X** No ☐	Yes ☐ No ☐	Yes ☐ No ☐
ıe last two test results are available? (Tests are required ery 60 days.)	Yes **X** No ☐	Yes **X** No ☐	Yes ☐ No ☐	Yes ☐ No ☐
st results show a negative voltage of at least 0.85 Volts sing the tank and a copper/copper sulfate cell)?	Yes **X** No ☐	Yes **X** No ☐	Yes ☐ No ☐	Yes ☐ No ☐

mments: Unloading lines are hardpiped to the USTs which negates the need for a spill bucket at the USTs. Railcars are unloaded over top, any spill will drop into the railcar. Tank truck unloading area is within a secondary containment area that will captureany spills.

pector's Signature: _____ Date: 5/13/10

ATTACHMENT 2

Ashland, Inc. 3/23/10
Elkton, MD
Facility ID# 2738 PHOTO I-1



Vinyl Acetate Monomer (VAM) UST Area
Overview of the area and the light blue aboveground piping system
Signs designate the North VAM UST (left) and the South VAM UST (right)

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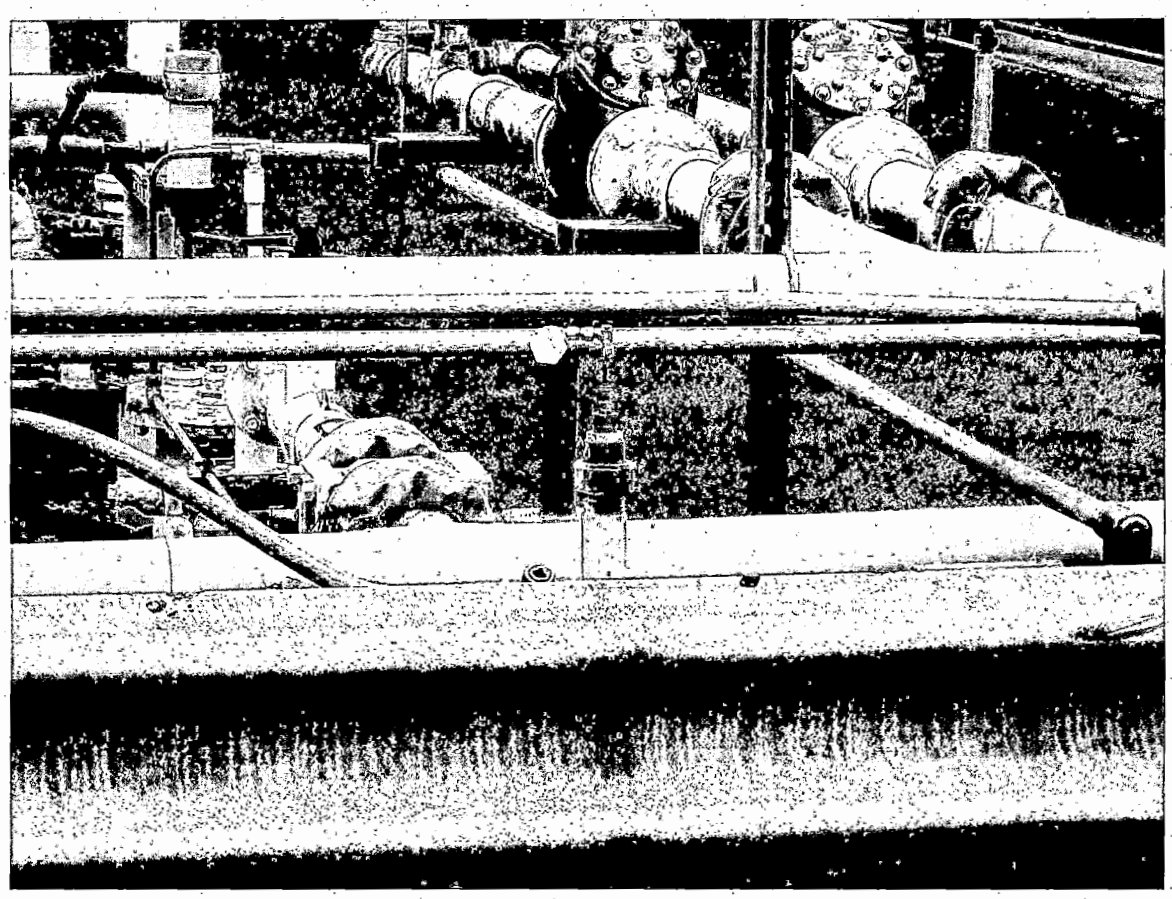
Facility ID# 2738 PHOTO I-2



VAM UST Area
One of the vapor monitoring ports at center of photo

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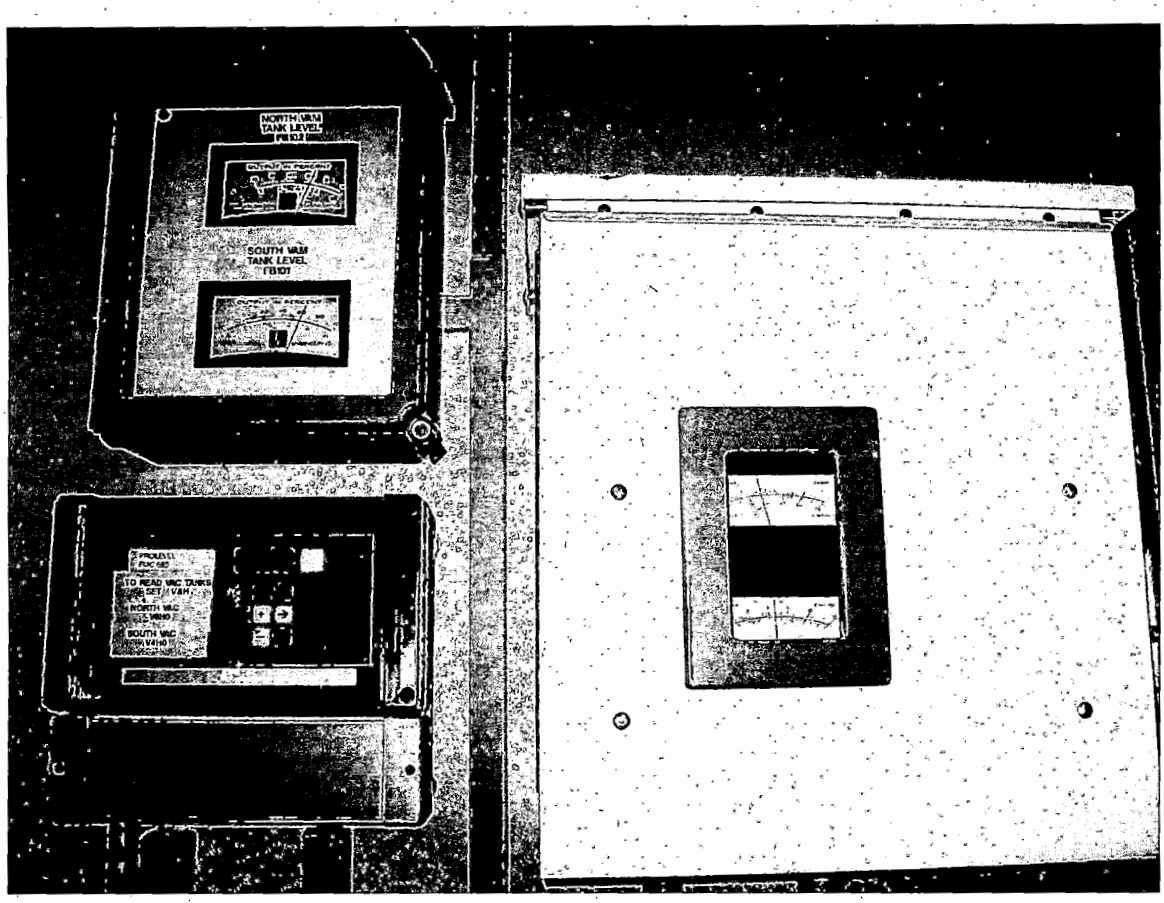
Facility ID# 2738 PHOTO I-3



Scale House, directly across from VAM UST Area
Level monitors for the VAM USTs at left
Rectifier Box for the VAM USTs at right

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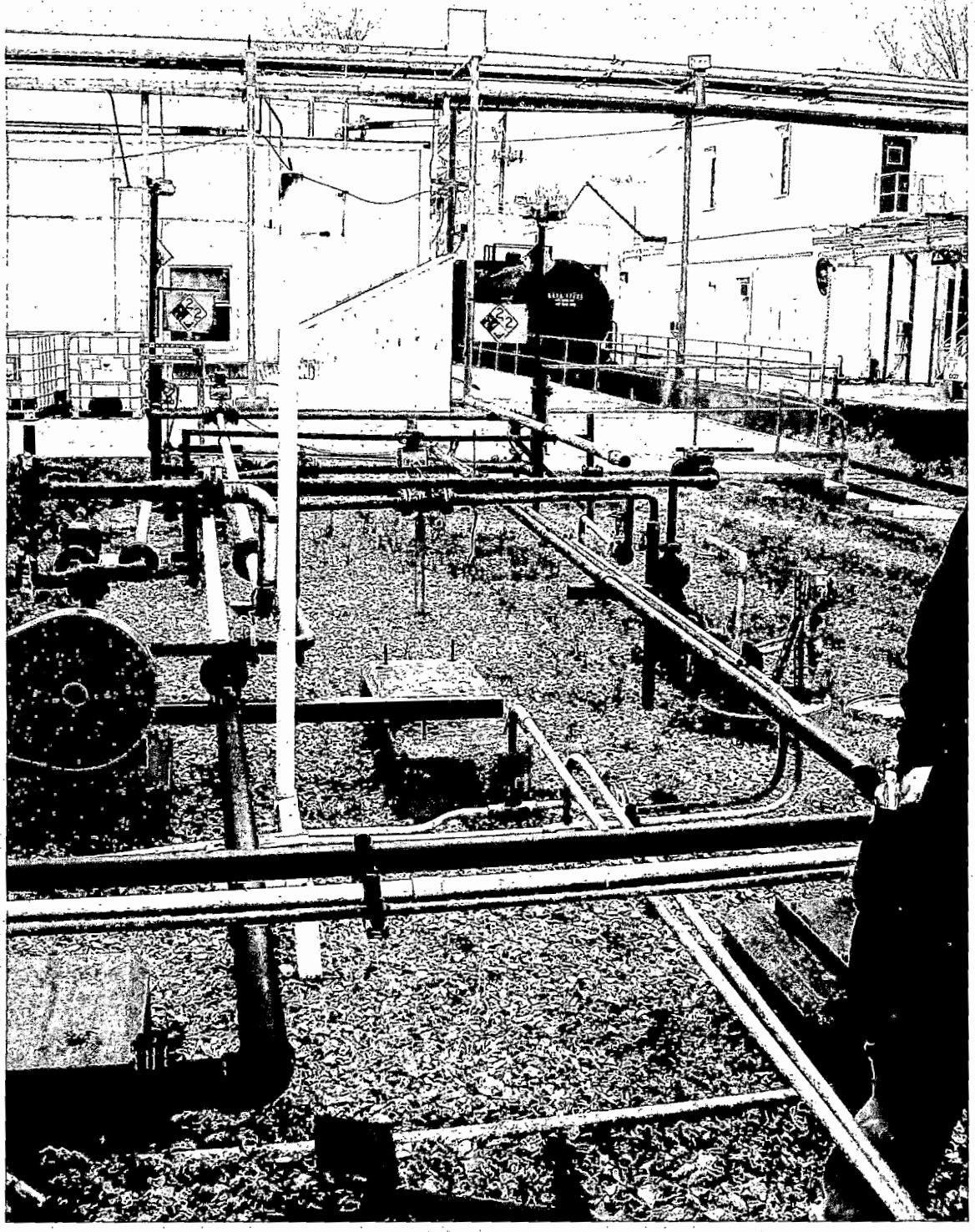
3/23/10

PHOTO I-4



Butyl Acrylate (BA) UST storage area – near North Tank Farm
Overview of the area and the aboveground piping

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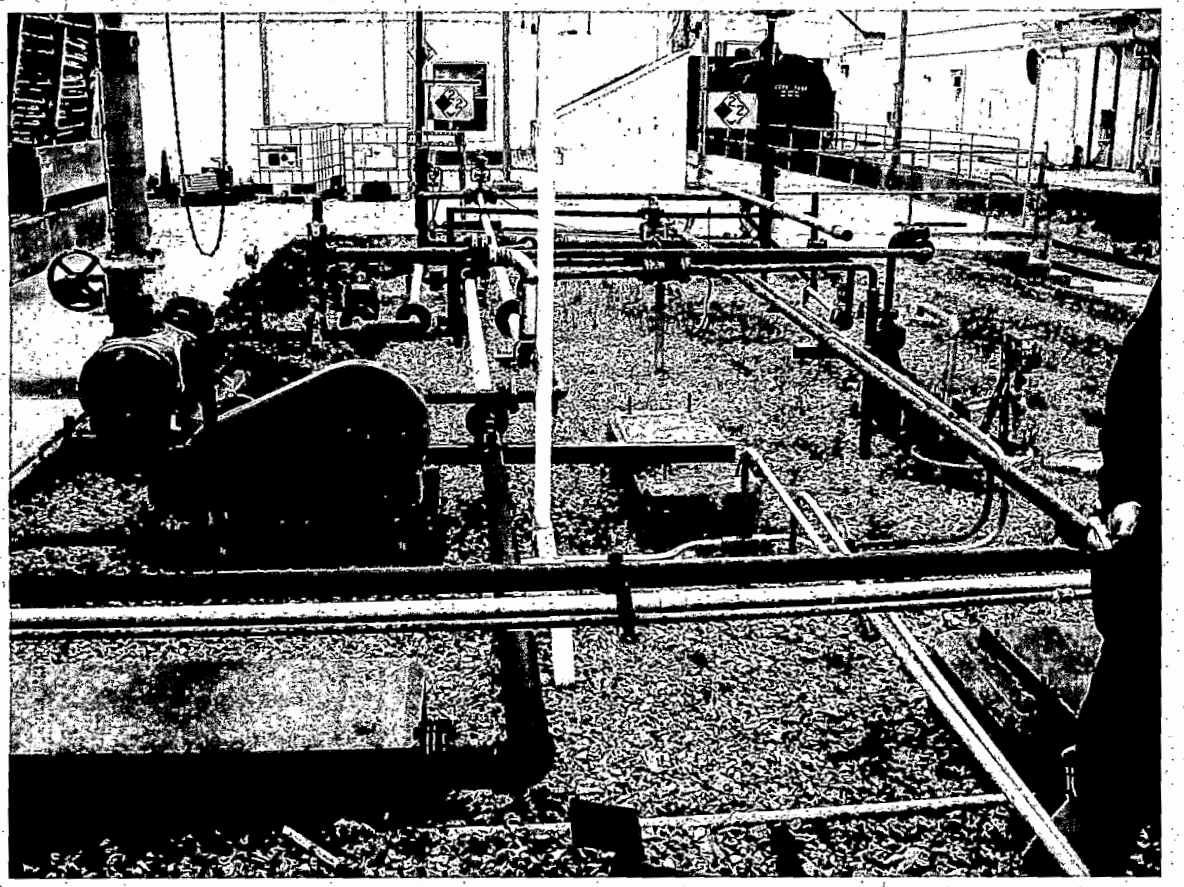

BA UST storage area
Overview of the area of the two UST systems
Railcar at right is at one of the product loading positions on the loading siding

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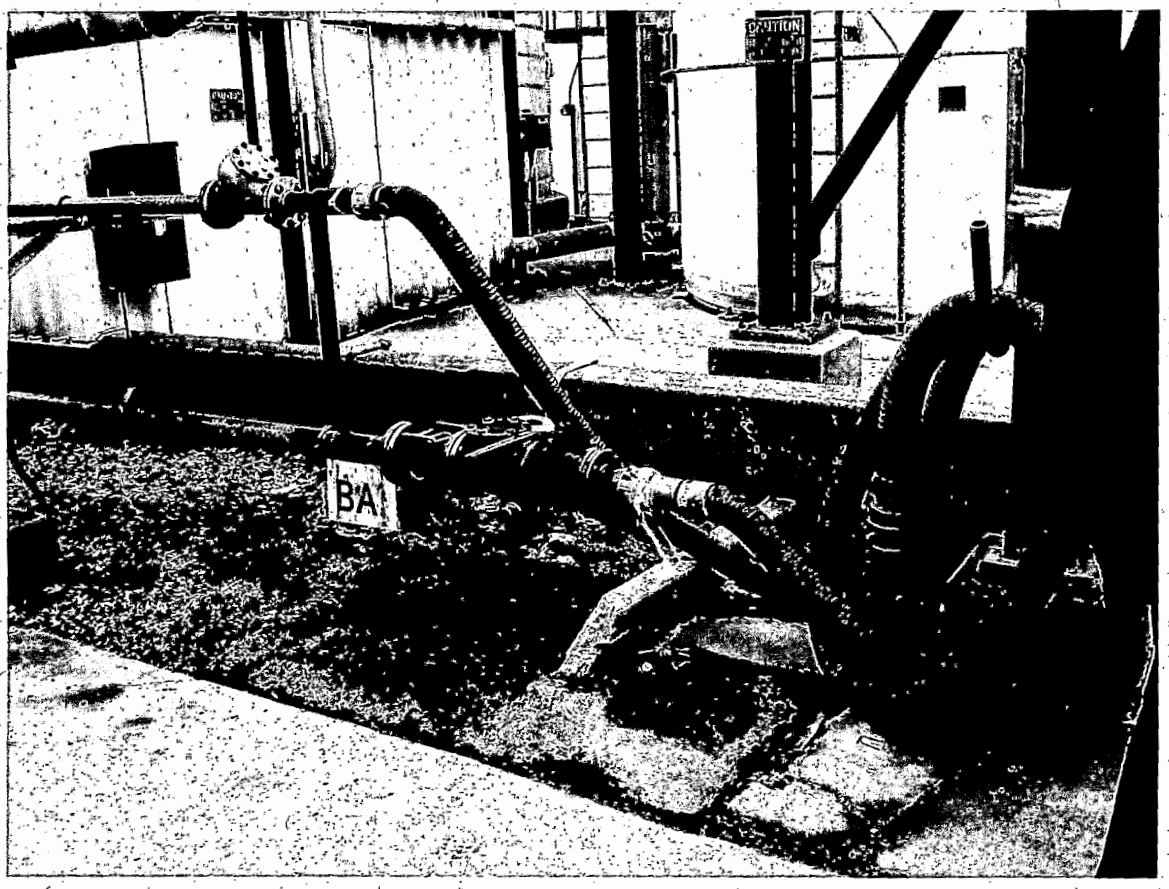

BA tank truck unloading area
Bottom line is product unload
Top line is vapor return to the tank truck

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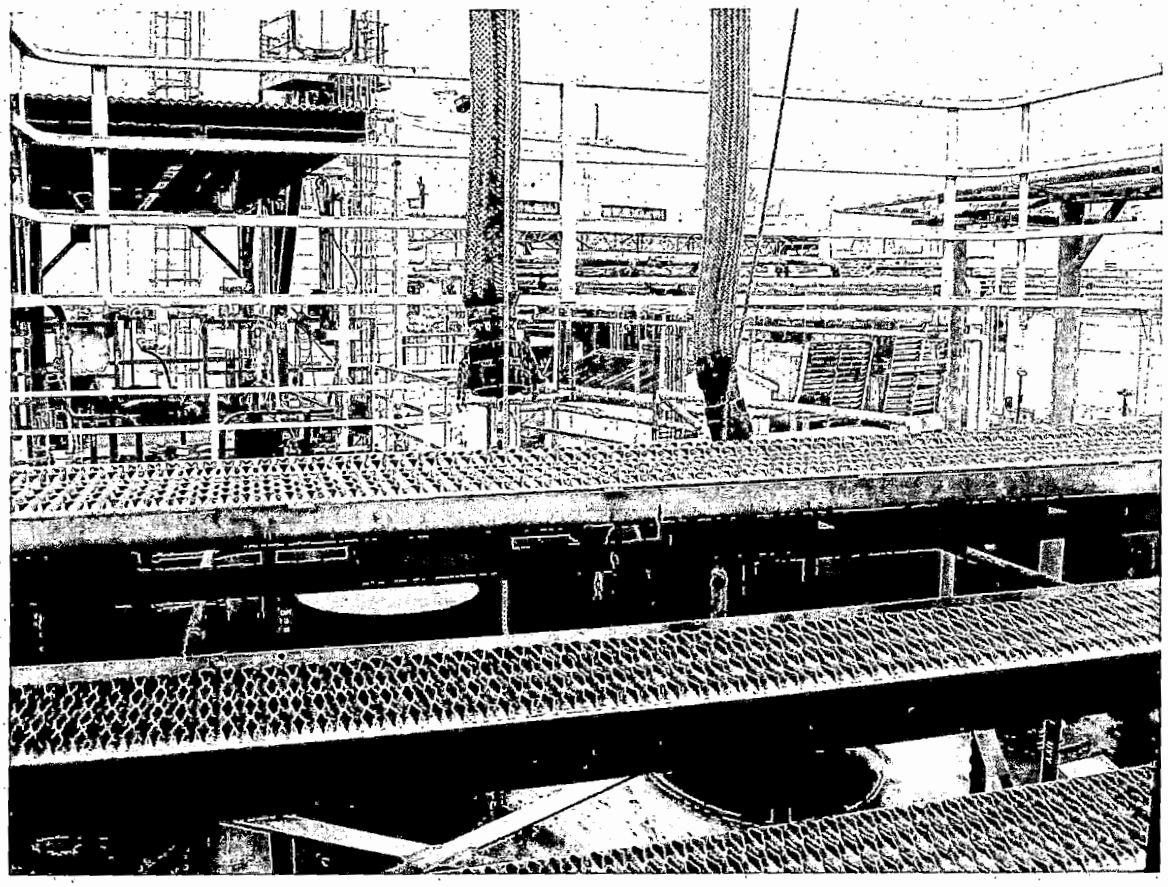

VAM Railcar unloading hoses, railcar is located underneath on unloading siding
One hose for top unloading of material, other hose for vapor return to the railcar

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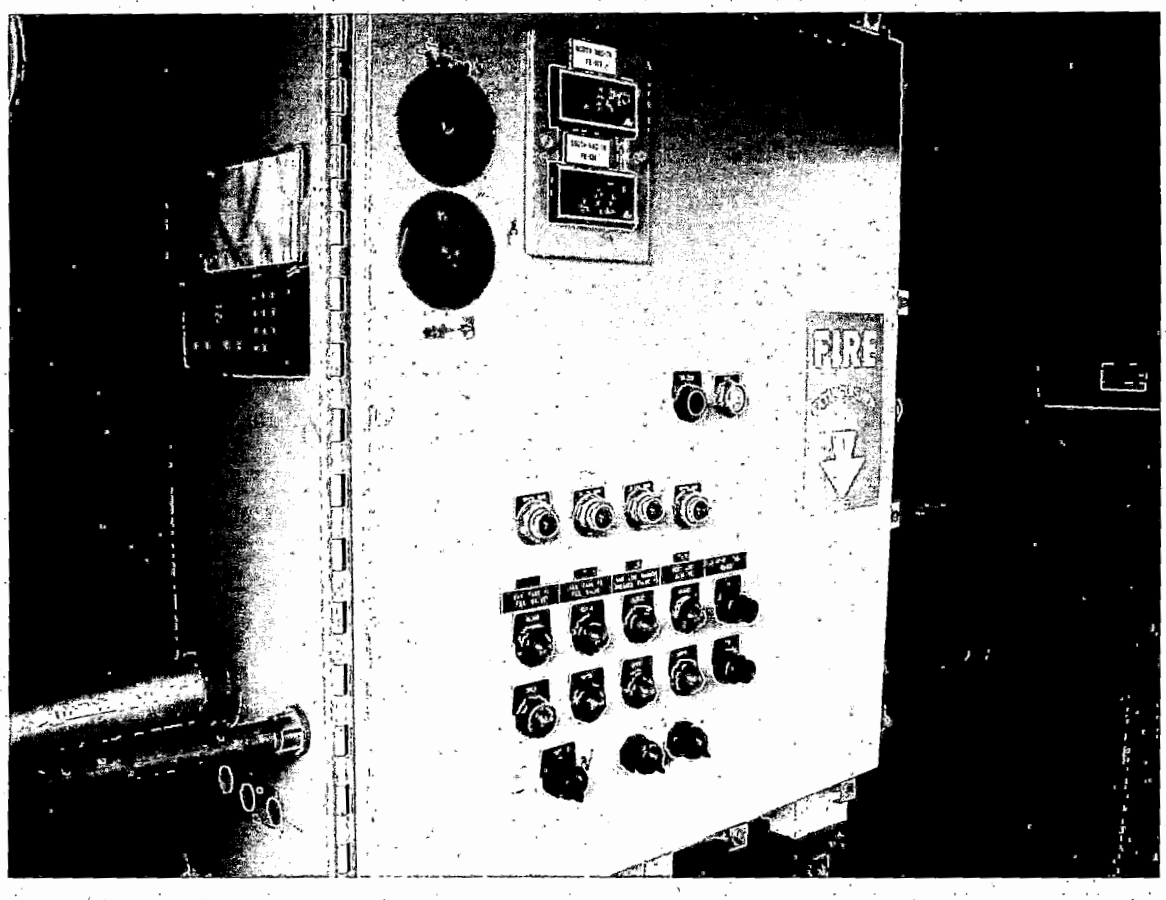

Shed at VAM railcar unloading area
Control box for VAM unloading, box includes level monitors for VAM USTs and remote control for VAM unloading valve train
Alarm test and silence buttons at left of fire extinguisher label

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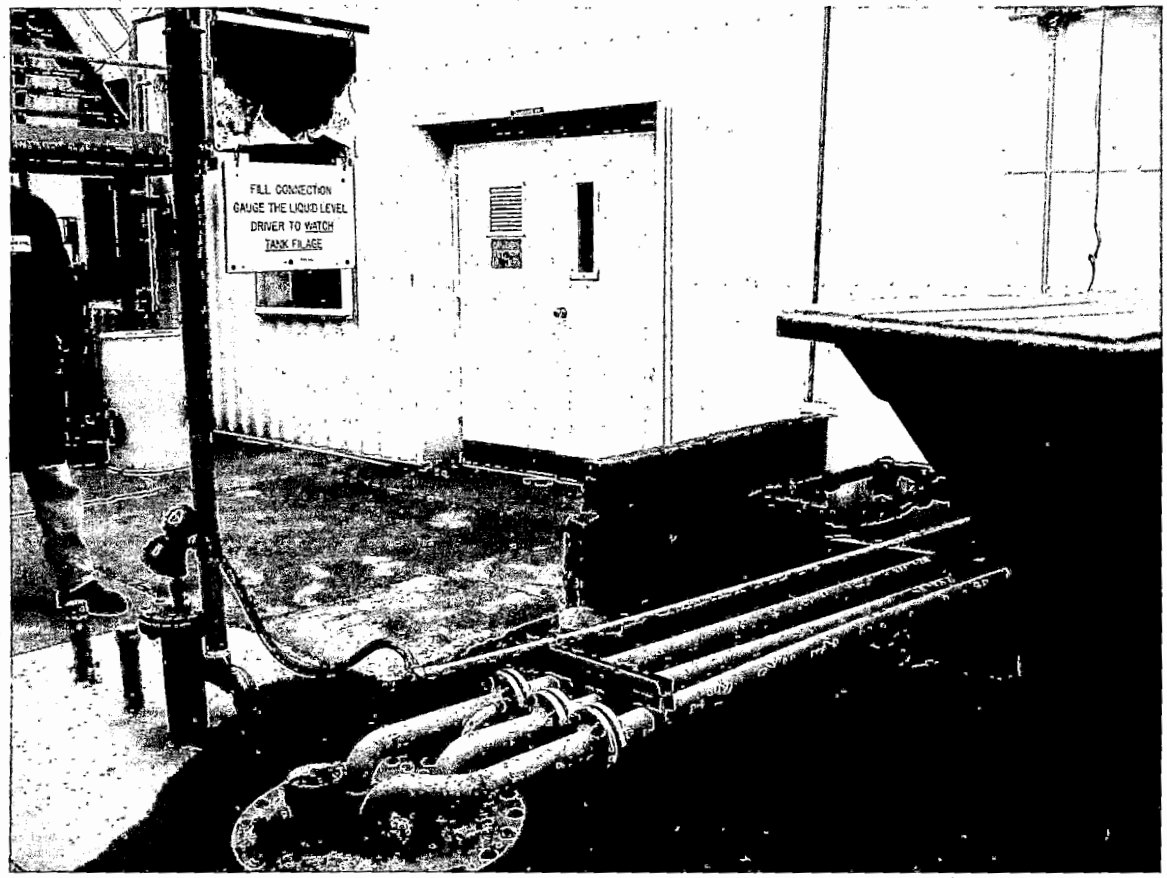

Fuel Oil UST Area, outside of Maintenance Shop & Boiler Room
Level monitor readout at left of vent line
Capped fill connection extending upward from manhole, piping all aboveground

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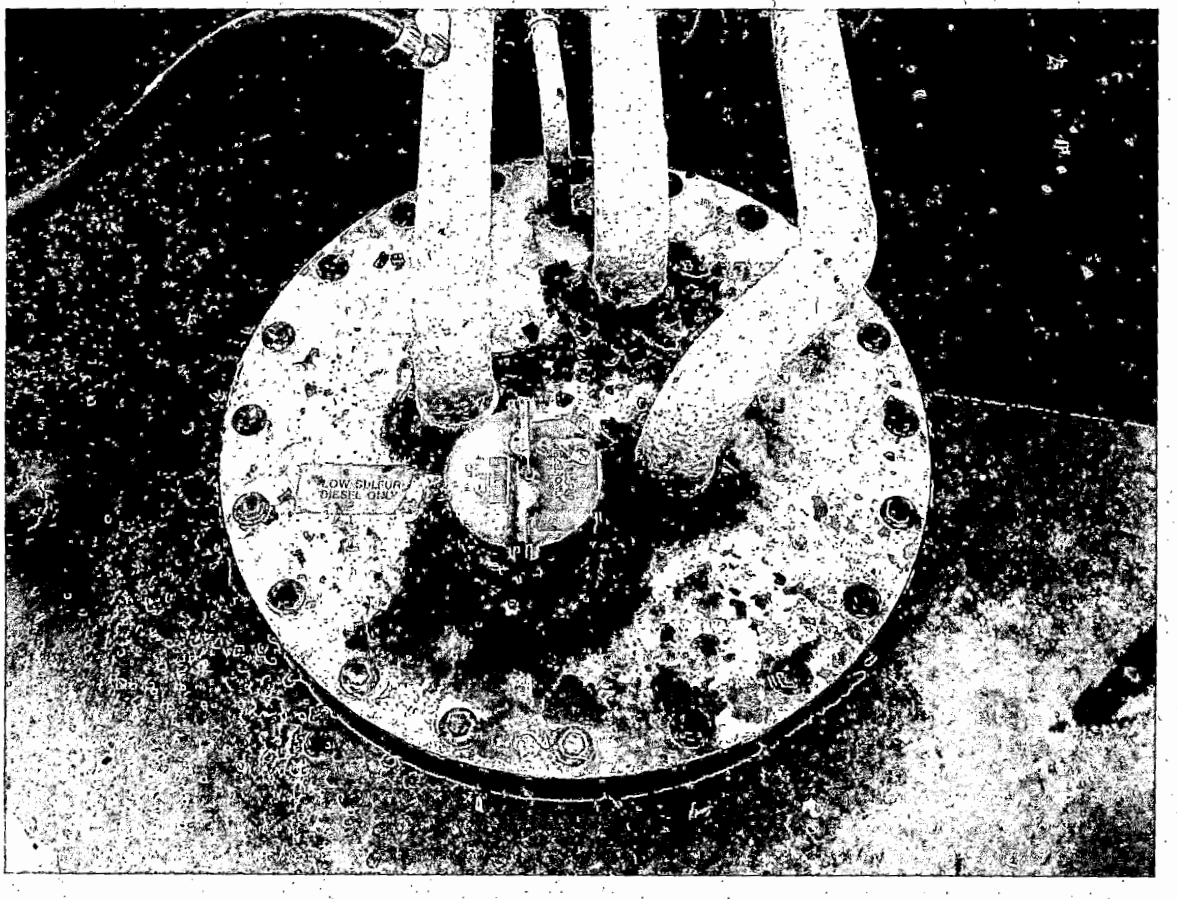

Fuel Oil UST Area
Close up of the manhole and piping connections from PHOTO I-9

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Fuel Oil UST Area
Close up of the level monitor assembly

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3/23/10

PHOTO I-12

Fuel Oil UST Area
Sign present at the area for fuel oil unloading

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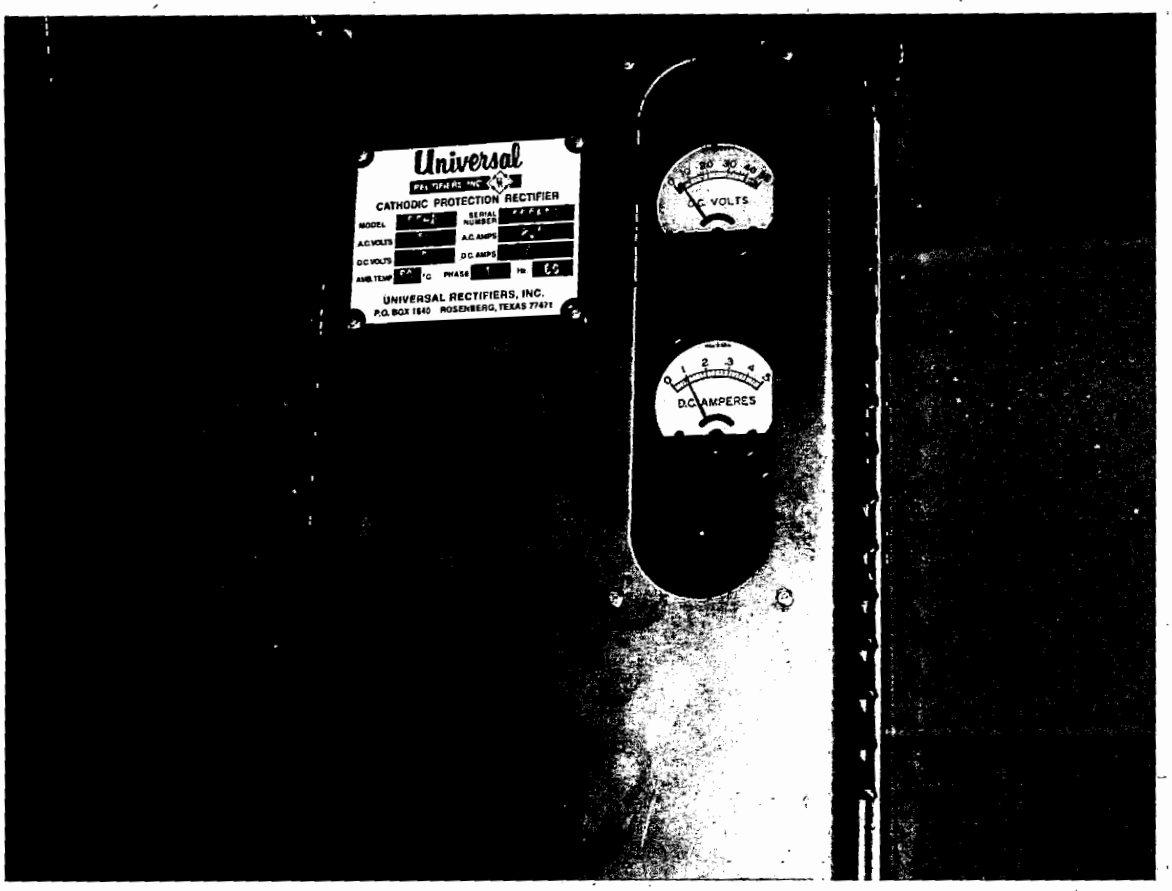

Fuel Oil UST Area – Adjacent Maintenance Shop
Rectifier box for the fuel oilUSTt system

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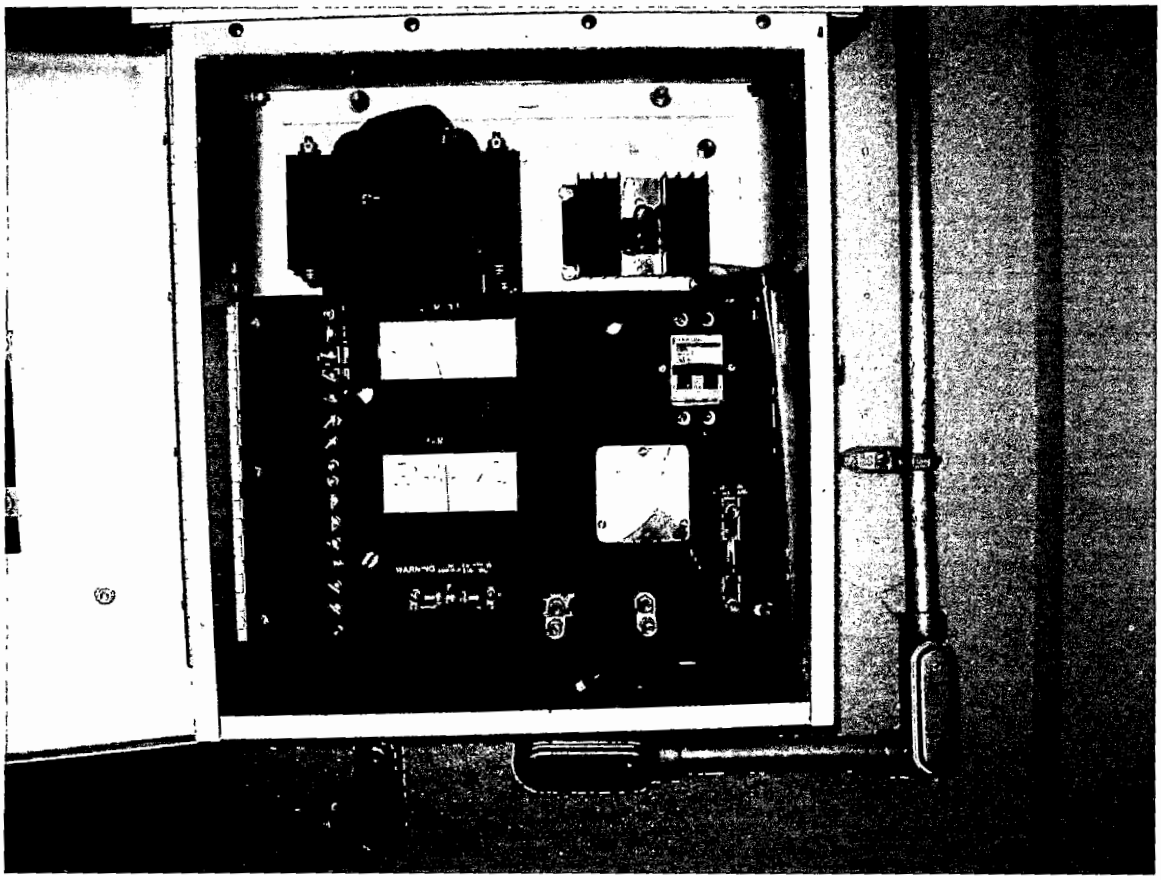

Scale House, across from VAM UST Area
Rectifier box for the VAM UST systems

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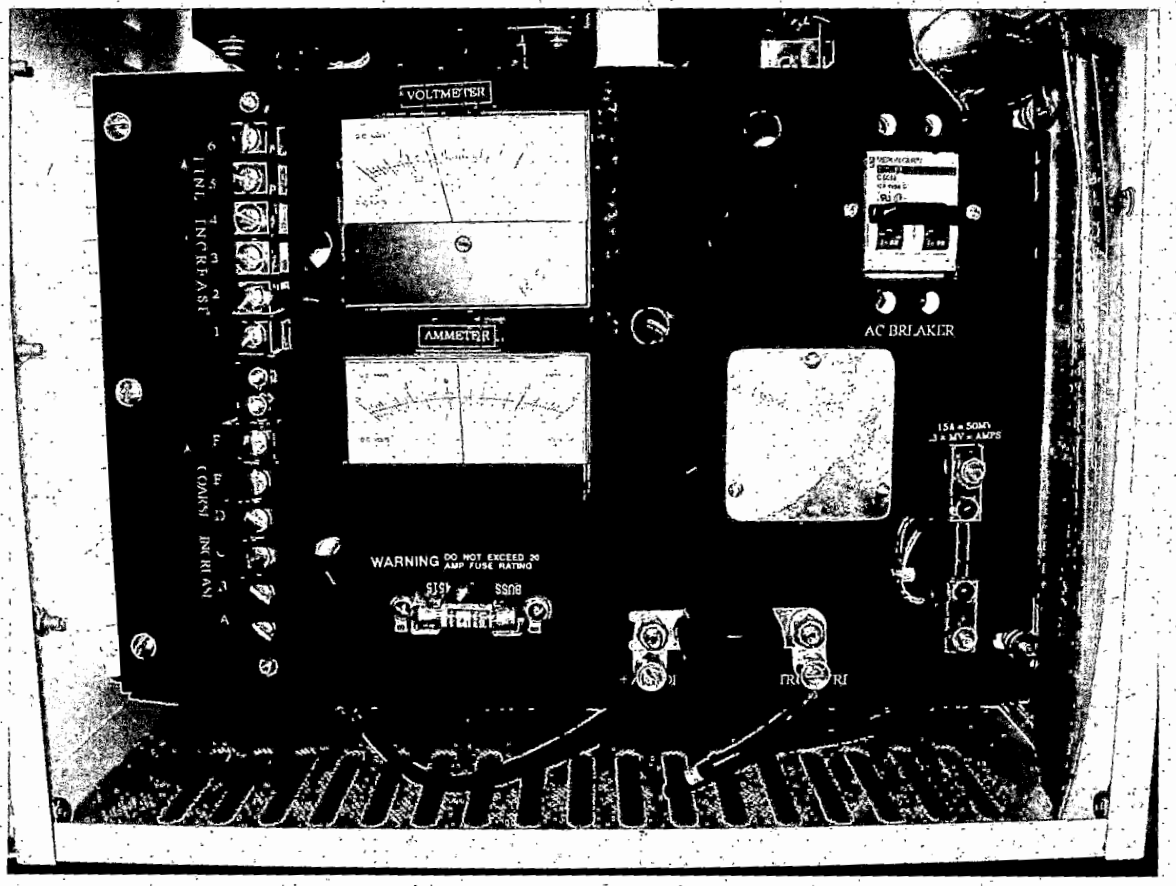
Facility ID# 2738 PHOTO I-15



Scale House, across from VAM UST Area
Internals of the VAM UST rectifier box

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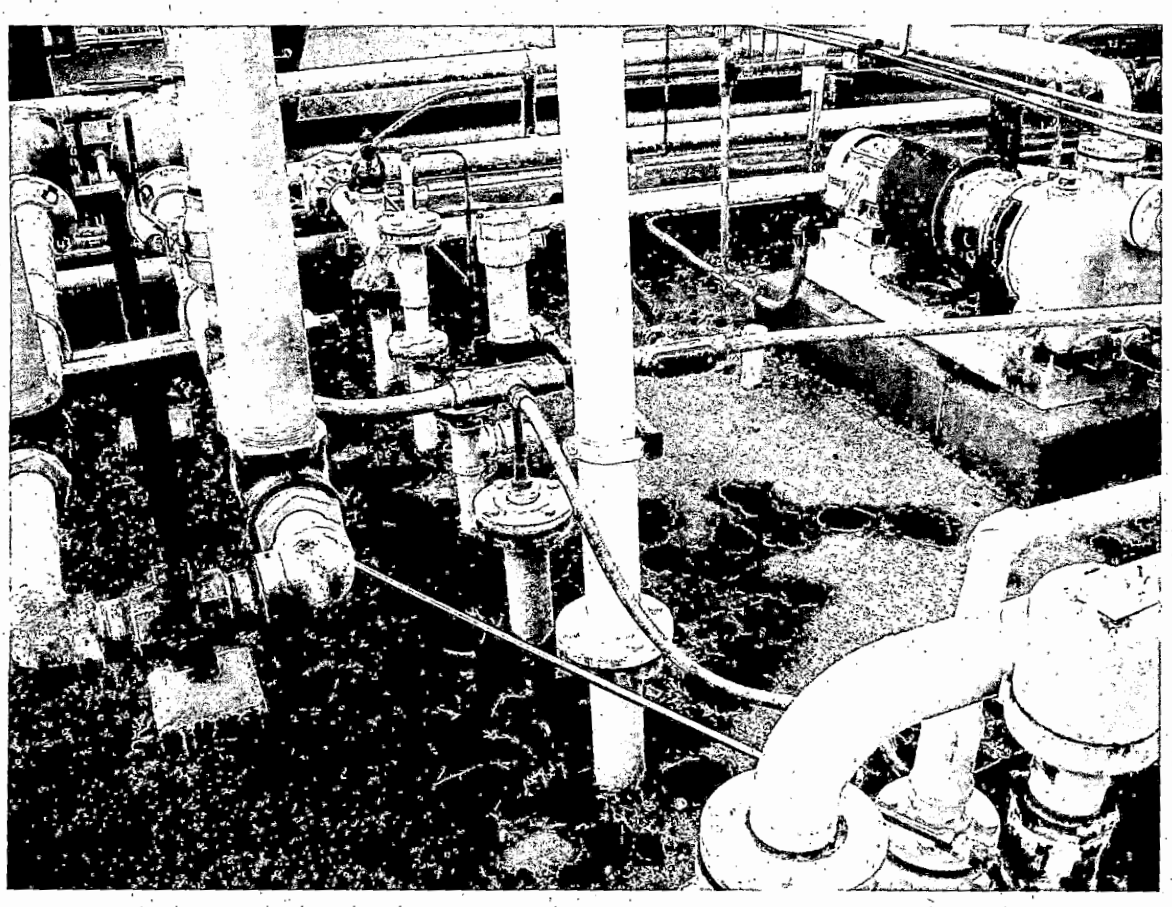
Facility ID# 2738 PHOTO I-16



VAM UST Area
Piping connections to the VAM South UST

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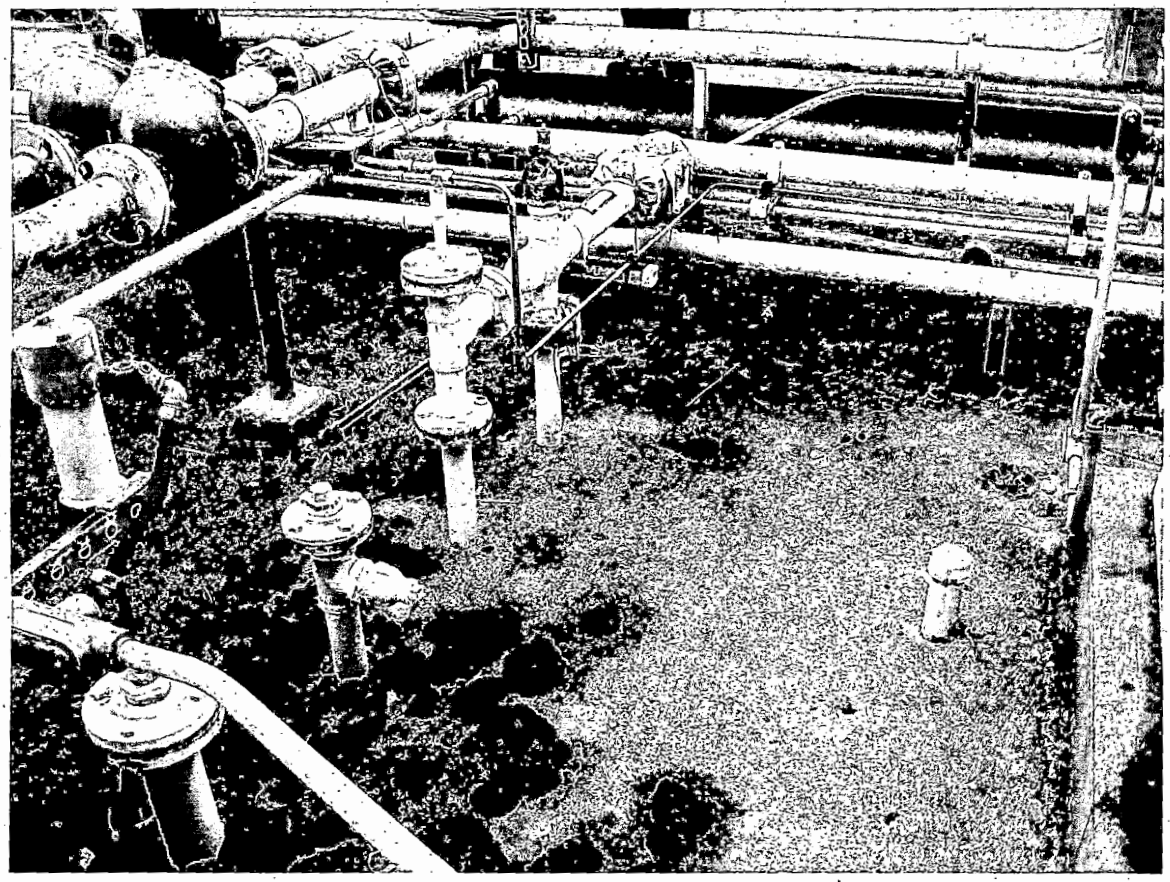
Facility ID# 2738 PHOTO I-17



VAM UST Area, piping connections for South VAM UST (4 in line light blue)
Left to right (liquid level monitor, capped, pump fill, main fill)

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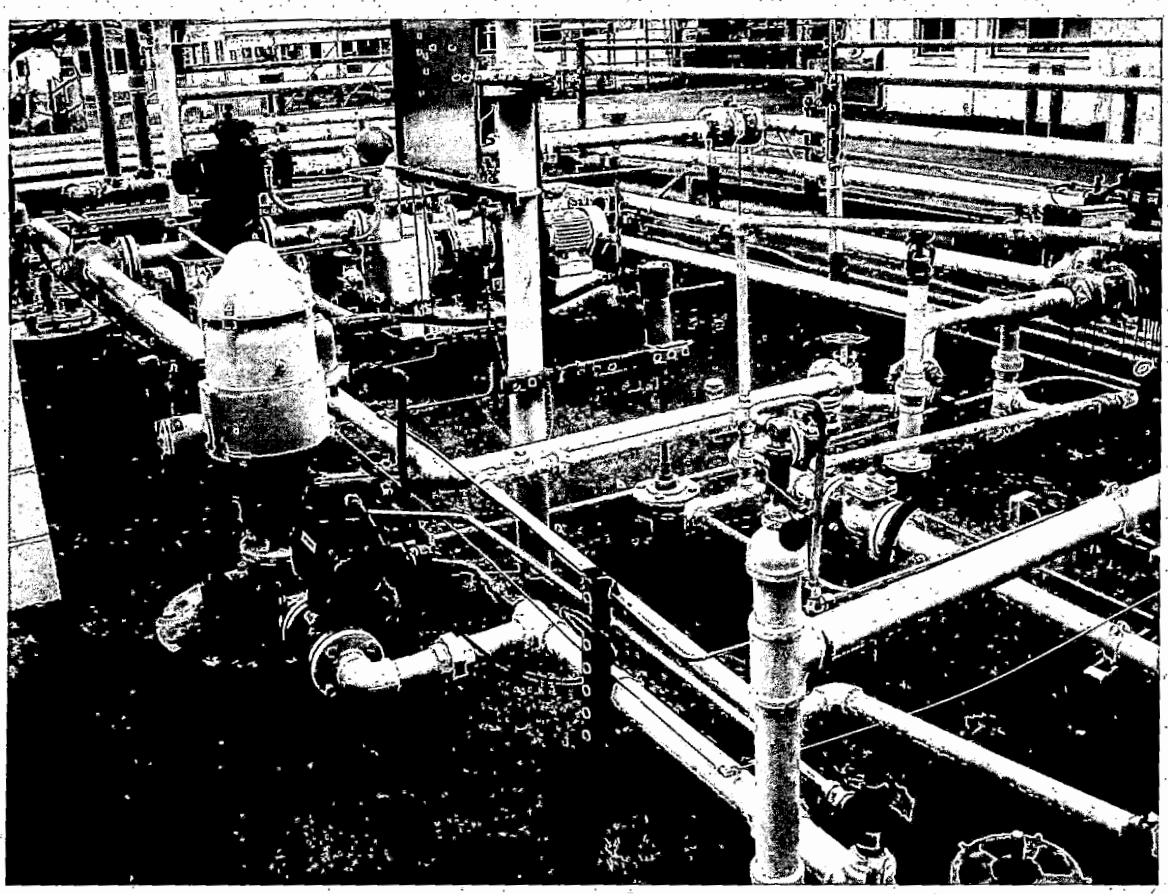
Facility ID# 2738 PHOTO I-18



VAM UST Area
General overview of the area from the NE corner, scale building at right

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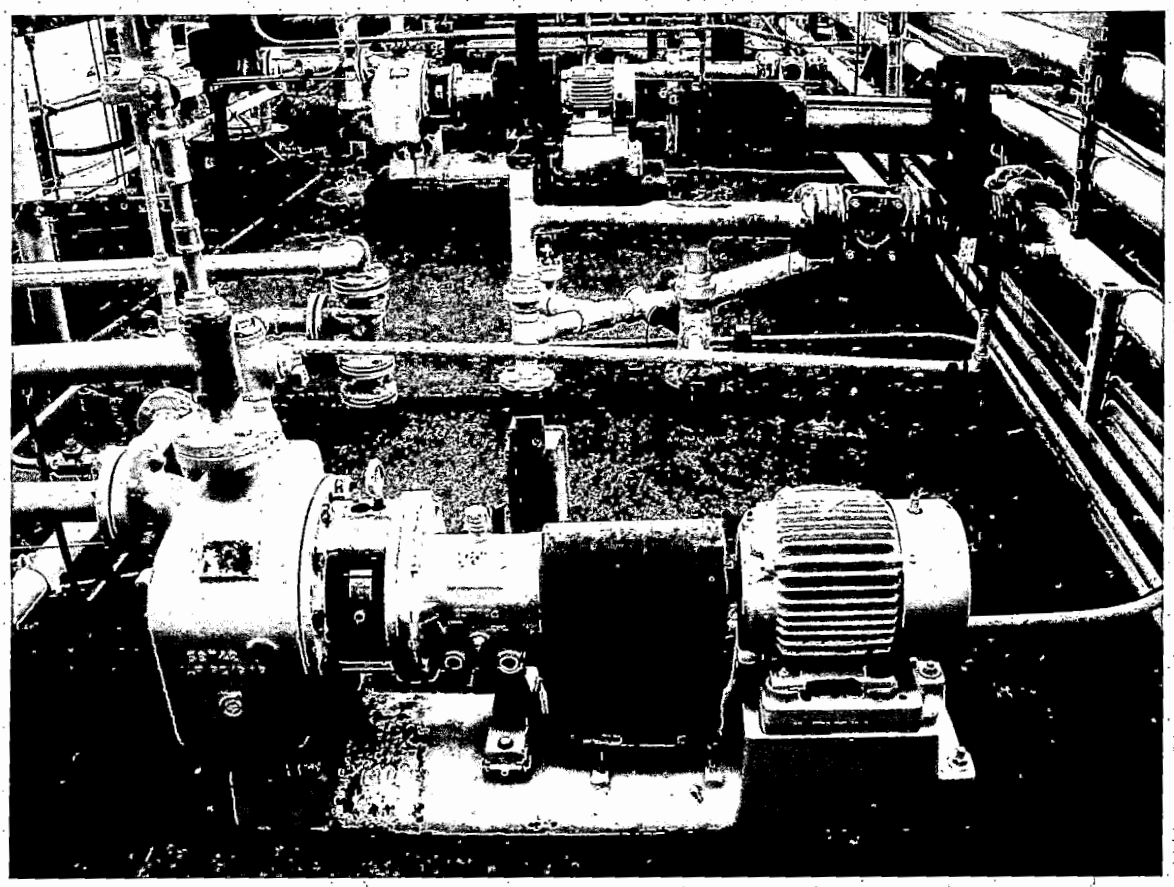
Facility ID# 2738 PHOTO I-19



VAM UST Area looking from the North
Rotary vane pumps to supply VAM from USTs to Manufacturing

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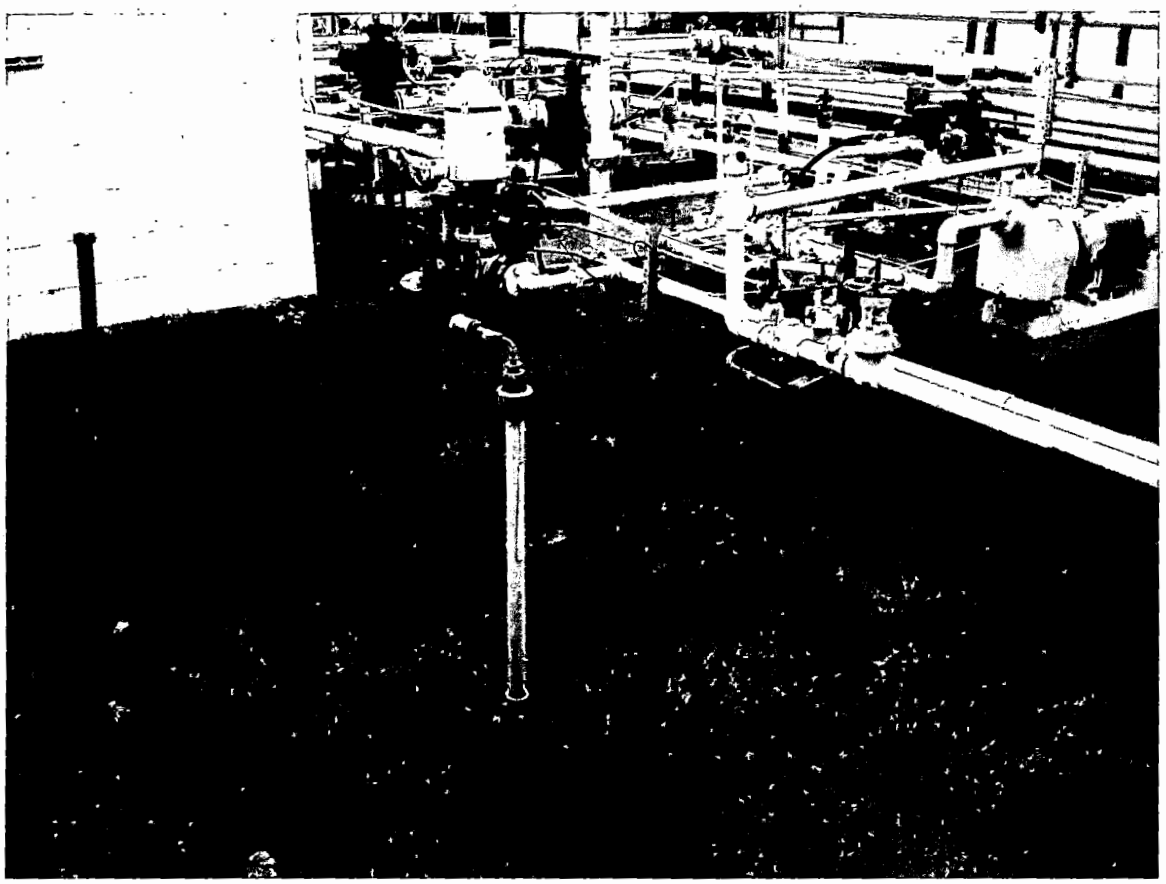
Elkton, MD
Facility ID# 2738 PHOTO I-20



VAM UST Area looking from the NE corner
One of the vapor monitoring ports in the foreground
A third VAM supply pump next to the concrete block structure on left

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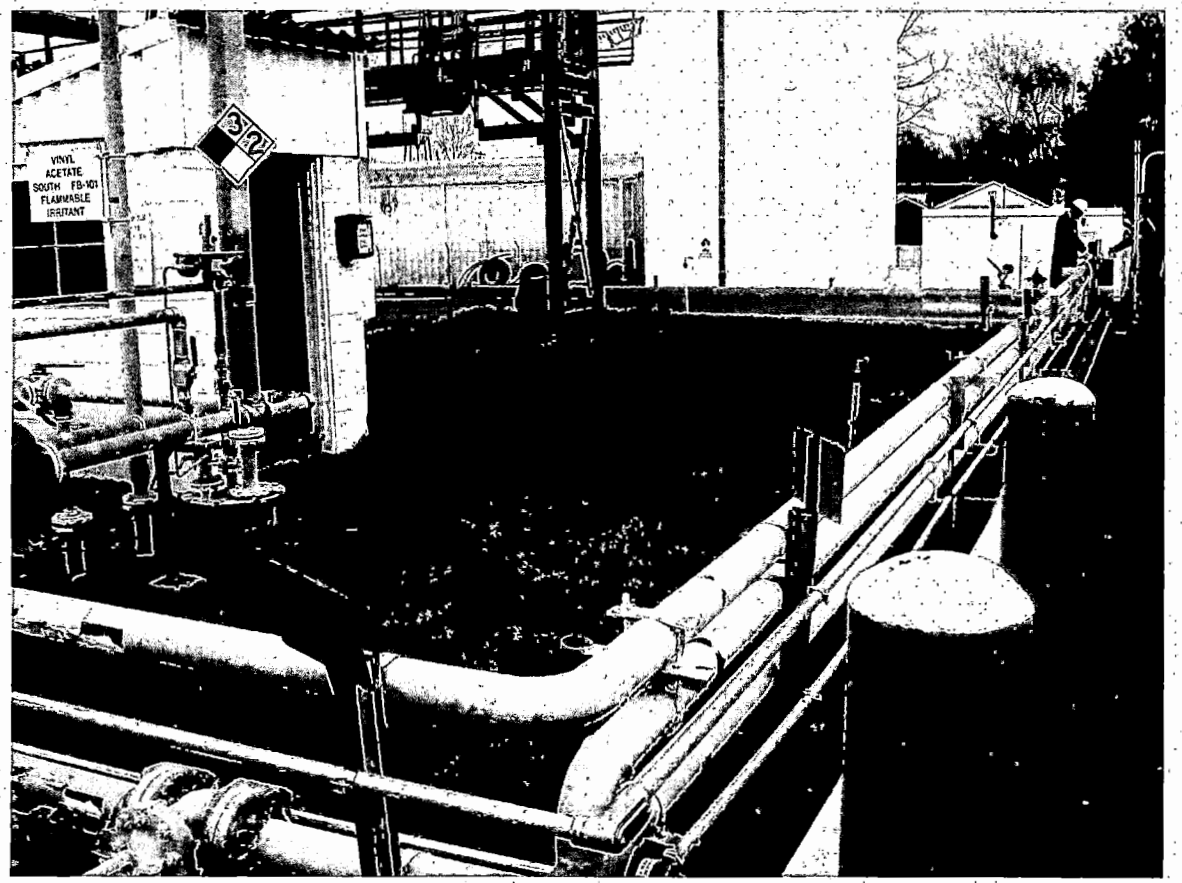
Elkton, MD
Facility ID# 2738 PHOTO I-21



VAM UST Area looking from SW corner
Two additional vapor monitoring port locations
Tank truck product loading / tank truck VAM unloading area at rear
Concrete block structure from PHOTO I-20 at left

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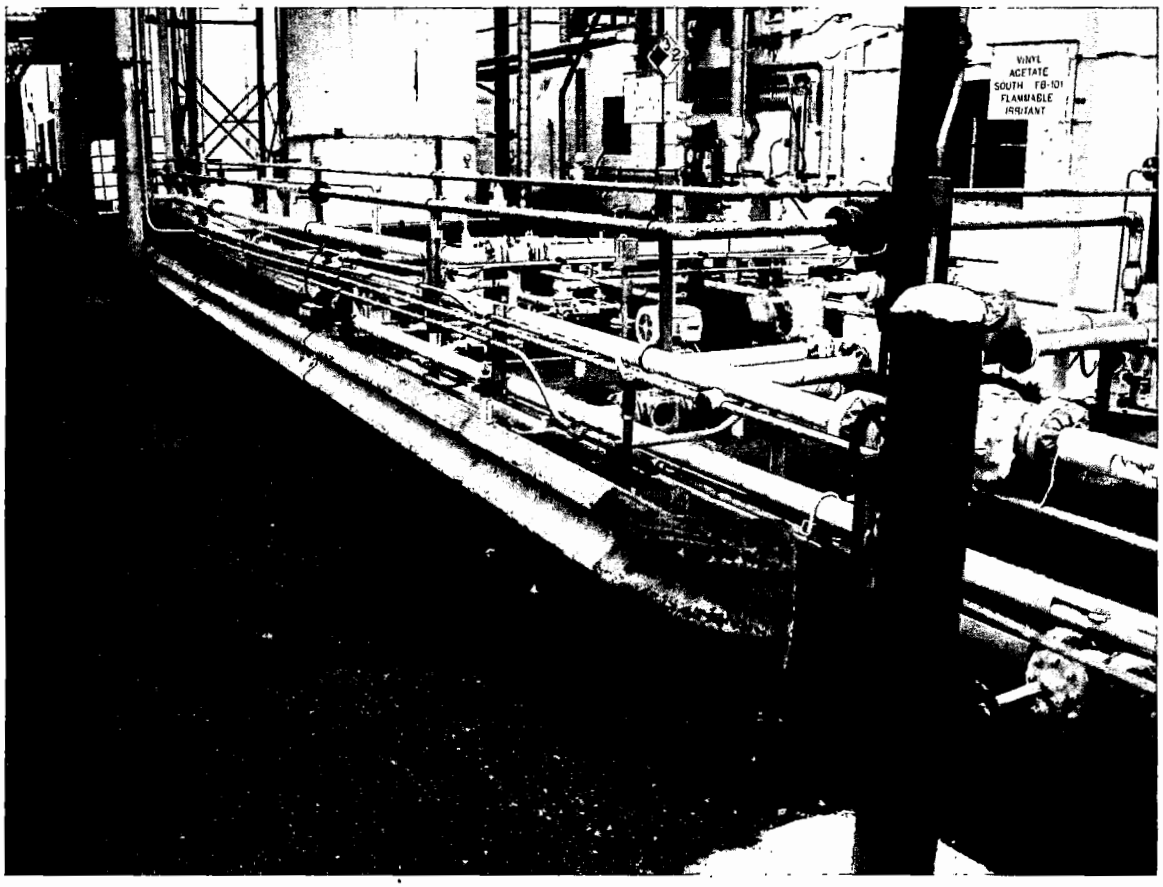
Elkton, MD
Facility ID# 2738 PHOTO I-22



VAM UST Area looking from SE corner
Overview of area, effluent tanks at top left